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*Attorneys for Worldpay, LLC***UNITED STATES BANKRUPTCY COURT****DISTRICT OF NEVADA**

In re:

GUMP'S HOLDINGS, LLC,

☐ Affect this Debtor.☒ Affects all Debtors.☐ Affects Gump's Corp.☐ Affects Gump's By Mail, Inc.

Case No.: 18-14683-LEB

Chapter 11

*Jointly administered with:*

No.: 18-14684-LEB (In re Gump's Corp.)

No.: 18-14685-LEB (In re Gump's By Mail, Inc.)

Current Hearing Date: October 30, 2018

Current Hearing Time: 9:30 a.m.

Continued Hearing Date: November 13, 2018

Continued Hearing Time: 9:30 a.m.

**STIPULATION CONTINUING HEARING ON MOTION FOR PRECAUTIONARY RELIEF  
 FROM THE AUTOMATIC STAY AND OTHER RELIEF NECESSARY TO PERMIT  
 PROCESSING OF CREDIT CARD TRANSACTIONS BY CUSTOMERS OF DEBTOR  
 GUMP'S BY MAIL, INC.**



1 This Stipulation Continuing Hearing on Motion for Precautionary Relief From The Automatic  
2 Stay and Other Relief Necessary to Permit Processing of Credit Card Transactions by Customers of  
3 Debtor Gump's By Mail. Inc. is entered into by and among Worldpay LLC ("Worldpay"), Debtors  
4 Gump's By Mail, Inc., Gump's Holdings LLC and Gump's Corp. (collectively, "Debtors"), Hilco  
5 Merchant Resources LLC and Gordon Brothers Retail Partners LLC (collectively, "Agent"), the  
6 Official Committee of Unsecured Creditors (the "Committee") and Sterling Business Credit LLC  
7 ("Sterling") (and all of the foregoing parties, collectively, the "Parties").

8 1. On or about September 24, 2018, Worldpay filed in these cases its Motion for  
9 Precautionary Relief from The Automatic Stay and Other Relief Necessary to Permit Processing of  
10 Credit Card Transactions By Customers of Debtor Gump's By Mail. Inc. [Docket No. 195] (the  
11 "Motion").

12 2. At present, the deadline for filing of any written oppositions to the Motion is Tuesday,  
13 October 23, 2018.

14 3. Worldpay, the Debtors and the Agent are currently in the process of exchanging  
15 information relevant to the Motion and discussing the possibility of a consensual resolution to the  
16 Motion, which efforts, perhaps with additional input from the Committee and Sterling, will hopefully  
17 result in the successful negotiation, and submission to the Court, of an agreed order resolving the  
18 Motion to which all of the parties will consent.

19 4. In order to afford the Parties additional time to negotiate towards a consensual resolution  
20 of the Motion, ideally before any of the Parties is required to expend time and resources on the  
21 preparation and filing of any written opposition to the Motion, Worldpay has agreed to continue the  
22 hearing on its Motion, and the Court has indicated that the hearing may be conducted on Tuesday,  
23 November 13, 2018 at 9:30 a.m.

24 5. Accordingly, the Parties hereby collectively stipulate and agree that (a) the hearing on  
25 Worldpay's Motion will be continued and re-set for **Tuesday, November 13, 2018 at 9:30 a.m.**; (b)  
26 the date by which the Debtors, the Agent, the Committee or Sterling is required to file any written  
27 opposition to the Motion shall be **Tuesday, November 6, 2018**; and (c) the date by which Worldpay



1 is required to file a written reply to any opposition to the Motion shall be **Thursday, November 8,**  
2 **2018.**

3  
4 DATED this 23rd day of October, 2018.

5 **ANDERSEN LAW FIRM, LTD.**

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20 *Attorneys for Worldpay, LLC*

21 DATED this 23rd day of October, 2018.

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*Attorney for Hilco Merchant Resources LLC  
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DATED this 23rd day of October, 2018.

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*Attorneys for the Official Committee  
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DATED this 23rd day of October, 2018.

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1 DATED this 23<sup>rd</sup> day of October, 2018.

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